

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KEITH PELZEL

Plaintiff,

vs.

LSI TITLE AGENCY, INC.; GMAC
MORTGAGE, LLC; HOMECOMINGS
FINANCIAL NETWORK, INC.; FIRST
AMERICAN TITLE INSURANCE
COMPANY; MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.; ALL
PERSONS UNKNOWN, CLAIMING ANY
VALID SUBSISTING INTEREST, AND
RIGHT TO THE POSSESSION IN THE
PROPERTY DESCRIBED IN THE
COMPLAINT ADVERSE TO PLAINTIFF'S
TITLE, OR ANY CLOUD ON PLAINTIFF'S
TITLE THERETO, AND DOES I-X,
INCLUSIVE,

Defendants.

NO. CV 11-05106-RBL

STIPULATION AND ORDER FOR
WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR
DEFENDANT, FIRST AMERICAN
TITLE INSURANCE COMPANY,
PURSUANT TO GR 2(g)(4)(A)

NOTE ON MOTION CALENDAR:

September 1, 2011

STIPULATION

Defendant, First American Title Insurance Company ("First American"), and the
parties hereto, have stipulated to the withdrawal of attorneys of record in this matter for First

STIPULATION AND ORDER TO
WITHDRAWAL AND SUBSTITUTE
COUNSEL FOR DEFENDANT, FIRST
AMERICAN TITLE INSURANCE COMPANY,
PURSUANT TO GR 2(g)(4)(A) - 1

BISHOP WHITE, MARSHALL & WEIBEL, P.S.
720 OLIVE WAY, SUITE 1201
SEATTLE, WASHINGTON 98101-1801
206/622-5306 FAX: 206/622-0354

CV 11-05106-RBL

1 American, Ann T. Marshall and Kennard M. Goodman of Bishop, White, Marshall & Weibel,
2 P.S., and to the substitution of new counsel below:

3 John T. Ludlow
4 Hanson Baker Ludlow Drumheller, P.S.
5 2229 – 112th Avenue NE, #200
6 Bellevue, WA 98004
7 Telephone: (425) 454-3374
8 Email: jludlow@hansonbaker.com

9 Ann T. Marshall, as indicated in the attached certification, certifies that this stipulation
10 and proposed order has been served upon her client, First American, and that First American
11 has consented to the same.

12 STIPULATED AND AGREED this 1st day of September, 2011.

13 /s/
14 Jill J. Smith, WSBA #41162
15 Jill.smith@naturalresourcelawgroup.com
16 NATURAL RESOURCE LAW GROUP, PLLC
17 2217 NW 44th Street
18 P.O. Box 17741
19 Seattle, WA 98107
20 Telephone: 206-227-9800
21 Facsimile: 206-216-5215

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23 STIPULATION AND ORDER TO
24 WITHDRAWAL AND SUBSTITUTE
25 COUNSEL FOR DEFENDANT, FIRST
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CV 11-05106-RBL

1 /s/
2 Shawna M. Lydon, WSBA #34238
3 slydon@bpmlaw.com
4 Christopher W. Tompkins, WSBA# 11686
5 ctompkins@bpmlaw.com
6 BETTS PATTERSON & MINES, P.S.
7 701 Pike Street, Suite 1400
8 Seattle, WA 98101-3927
9 Telephone: 206-292-9988
10 Facsimile: 206-343-7053
11 Attorneys for Defendants
12 LSI Title Agency, Inc.
13 GMAC Mortgage, LLC
14 Homecomings Financial Network, Inc.
15 Mortgage Electronic Registration Systems, Inc.

16 /s/
17 Ann T. Marshall, WSBA #23533
18 amarshall@bwmlegal.com
19 Kennard M. Goodman, WSBA #22823
20 kgoodman@bwmlegal.com
21 BISHOP, WHITE, MARSHALL & WEIBEL, P.S.
22 Telephone: 206-622-5306
23 Facsimile: 206-622-0354
24 Withdrawing Attorneys for Defendant First American Title Insurance Company

25 /s/
26 John D. Ludlow, WSBA#7377
27 jludlow@hansonbaker.com
28 HANSON BAKER LUDLOW DRUMHELLER, P.S.
29 2229 - 112th Avenue NE, #200
30 Bellevue, WA 98004
31 Telephone: 425 454-3374
32 Facsimile: 425 454-0087
33 Substituting Attorney for Defendant First American Title Insurance Company

34 STIPULATION AND ORDER TO
35 WITHDRAWAL AND SUBSTITUTE
36 COUNSEL FOR DEFENDANT, FIRST
37 AMERICAN TITLE INSURANCE COMPANY,
38 PURSUANT TO GR 2(g)(4)(A) - 3

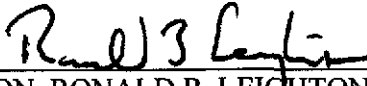
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1 **[PROPOSED] ORDER**

2 Based upon the foregoing stipulation and the certification of counsel, it is hereby
3 ORDERED that Ann T. Marshall and Kennard M. Goodman, of Bishop, White,
4 Marshall & Weibel, P.S., are hereby withdrawn as counsel of record for Defendant First
5 American Title Insurance Company, and John T. Ludlow of Hanson Baker Ludlow
6 Drumheller, P.S. is hereby substituted as counsel of record for Defendant First American
7 Title Insurance Company.

8 DATED this 20 day of September, 2011.

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11 HON. RONALD B. LEIGHTON
12 District Court Judge
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23 STIPULATION AND ORDER TO
24 WITHDRAWAL AND SUBSTITUTE
25 COUNSEL FOR DEFENDANT, FIRST
AMERICAN TITLE INSURANCE COMPANY,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she caused the STIPULATION AND ORDER TO WITHDRAW AND SUBSTITUTE COUNSEL FOR DEFENDANT, FIRST AMERICAN TITLE INSURANCE COMPANY, PURSUANT TO GR 2(g)(4)(A) to be served on her client and that her client consented to the same. The undersigned further certifies that, on September 1, 2011, she caused the same to be served on the Plaintiff and Defendants at the addresses list below and in the manner shown below:

Attorney for Plaintiff Keith Pelzel:

Jill J. Smith
Natural Resources Law Group, PLLC
2217 NW 44th Street
P.O. Box 17741
Seattle, WA 98107

☐ Via hand delivery
☐ Via U.S. Mail, First Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☒ Via CM/ECF System
☐ Via Email

***Attorneys for Defendants,
LSI Title Agency, Inc.,
GMAC Mortgage, LLC,
Mortgage Electronic Registration
Systems, Inc.; and
Homecomings Financial Network,
Inc.***

Christopher W. Tompkins
Shawna M. Lydon
Betts, Patterson & Mines, P.S.
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☐ Via hand delivery
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COUNSEL FOR DEFENDANT, FIRST
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PURSUANT TO GR 2(g)(4)(A) - 5

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John T. Ludlow
Hanson Baker Ludlow Drumheller, P.S.
2229 ~ 112th Avenue NE, #200
Bellevue, WA 98004

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☐ Via U.S. Mail, First Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☒ Via CM/ECF System
☐ Via Email

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 1, 2011.

/s/
Ann T. Marshall

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